

EXHIBIT C

LAW OFFICE OF BERNARD V. KLEINMAN, PLLC

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

===== :
CHARLES JOHNSON, :

Plaintiff/Counterclaim Defendant, : **23-cv-02441-KPF**

— *versus* — :

**PLAINTIFF’S SUPPLEMENTAL
RESPONSES TO INTERROGATORIES**

CLEARVIEW AI, INC., HOAN :
TON-THAT, RICHARD SCHWARTZ, :
Defendants. :

F.R.Civ.P. Rule 33

===== :
TO:

Ronald Andrew Giller, Esq.
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Pursuant to Scheduling Order as entered on or about July 1, 2024, as supplemented by the Court’s Order dated January 16, 2025 (ECF No. 68), and the Court’s order of April 02, 2025, please be advised of the following Supplemental Responses to Interrogatories,

**GENERAL OBJECTIONS TO INTERROGATORIES &
DEMANDS FOR PRODUCTION**

Plaintiff-Counter Defendant Johnson (hereinafter “Johnson”), incorporates by reference any and all Objections to Interrogatories as previously set forth in his Response dated November 22, 2024.

RESERVATION OF RIGHTS

By making the following responses to these Interrogatories, Johnson does not waive, and hereby expressly reserves, its objections to these Requests. By making these responses and objections, Johnson does not concede that any information sought by Counter Plaintiffs is discoverable, nor does Johnson waive any objections to the entry or admissibility of such responses under the Federal Rules of Evidence. Johnson makes these responses and objections without waiving or intending to waive the right to object on any ground to the use, introduction, or admissibility of the information provided in response to any Request on any and all grounds, including, but not limited to, competency, relevancy, materiality, and privilege. Subject to and without waiving its General Objections and Reservation of Rights, Johnson responds to the specific requests as follows:

INTERROGATORIES

6. Identify all documents concerning any litigation or administrative proceeding in which Plaintiff has ever been a plaintiff, complainant, petitioner, charging party, grievant, defendant or respondent (aside from the instant action).

ANSWER

Plaintiff was a plaintiff in a lawsuit against Gawker Media (*Johnson v Gawker Media*, 15cv1137, E.D. Mo.), and another case of the Huffington Post (*Johnson v.*

Thehuffingtonpost.com, 20cv179, S.D. Tex.). Plaintiff is a Defendant in *Point Bridge Capital, LLC v. Johnson*, 24cv988, N.D. Tex.

7. Identify each and every telephone number, cell phone number, social media account (e.g., Facebook, Twitter, Instagram, LinkedIn, TikTok, etc.), e-mail account, or other electronic account created, owned, maintained or controlled by Plaintiff at any time from November 24, 2018 through May 21, 2023.

ANSWER

To the best of Plaintiff's recollection he states that he does not have a Facebook, Twitter, or Instagram account. His LinkedIn account is in his name. His email accounts are charlescarlislejohnson@gmail.com and charles@traitwell.com. Tel. 617.429.4718.

Also: <https://charlesjohnson.substack.com>

16. Identify all documents, including written communications, between Plaintiff and any third party concerning, discussing, referring to, or otherwise relating to the Wind-Down Agreement from November 24, 2018 through May 21, 2023.

ANSWER

"The only person I talked to about the wind down agree was Kashmir Hill of the New York Times and she knew about it *before* I told her about it, indicating someone other than myself had disclosed it to her." Emphasis in original.

17. Identify all Clearview investors and/or shareholders whom you made oral or written statements to that impugned, attacked, were critical of, or otherwise mentioned the reputation, business or character of Clearview AI, Hoan Ton-That, and/or Richard Schwartz from November 24, 2018 through May 21, 2023.

ANSWER

“As far as I can recall the only person I have criticized is Hal Lambert, the now co-CEO. I also made comments about ex-Clearview.AI advisory board members Richard A. Clarke, Floyd Abrams, Lee Wolosoky and Lisa Linden.”

18. Identify all entities, including media outlets, whom you made oral or written statements to that impugned, attacked, were critical of, or otherwise mentioned the reputation, business or character of Clearview AI, Hoan Ton-That, and/or Richard Schwartz from November 24, 2018 through May 21, 2023.

ANSWER

France 24, Mother Jones, Washington Post, and The New York Times.

19. Identify each and every person, other than those identified in the previous interrogatories, whom you made oral or written statements to that impugned, attacked, or were critical of, or otherwise mentioned the reputation, business or character of Clearview AI, Hoan Ton-That, and/or Richard Schwartz from November 24, 2018 through May 21, 2023.

ANSWER

Jessica LeMasurier (France 24), Luke O'Brien (“Mother Jones”), Kashmir Hill (The NY Times).

20. Identify all written communications between Plaintiff and any third party wherein you impugned, attacked, or were critical of, or otherwise mentioned the reputation, business or character of Clearview AI, Hoan Ton-That, and/or Richard Schwartz from November 24, 2018 through May 21, 2023.

ANSWER

“Not sure I have anyone I’ve not done a written communication with anyone relevant to this Interrogatory, other than those previously identified.”

21. Identify all documents, including published statements, wherein you impugned, attacked, or were critical of, or otherwise mentioned the reputation, business or character of Clearview AI, Hoan Ton-That, and/or Richard Schwartz from November 24, 2018 through May 21, 2023.

ANSWER

“Other than documents provided by Defendants or myself, I sent one email to Hoan and Richard saying that I thought they were engaged in unethical behavior. That email appeared in Luke O'Brien’s Mother Jones article.”

Dated: April 16, 2025
Somers, NY

/s/ Bernard V. Kleinman
Bernard V. Kleinman, Esq.

CERTIFICATE OF SERVICE

I am Bernard V. Kleinman, attorney of record for the named Plaintiff herein. I do affirm under penalty of perjury that I did serve the within Plaintiff's Supplemental Responses to Defendants' Initial Interrogatories Defendants' counsel of record, via E-Mail to their attorney of record at the email address below:

Ronald A. Giller, Esq
rgiller@grsm.com

Dated: Apr. 16, 2025
Somers, NY

/s/ Bernard V. Kleinman
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